

Federal Defenders OF NEW YORK, INC.

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September 23, 2021

BY ECF AND EMAIL

Honorable Paul A. Crotty Southern District of New York 500 Pearl Street New York, NY 10007

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Dear Judge Crotty:

I write with two requests concerning Mr. Schneider's bail conditions:

First, I respectfully request that the Court move Mr. Schneider back to a curfew. Mr. Schneider was on a curfew from his November 30, 2020 arrest through June 24, 2021, when the Court placed him on home detention at the request of Pretrial Services due to positive drug tests. But Mr. Schneider has since recommitted himself to his sobriety and drug treatment, which now includes twice weekly in-person individual sessions and drug testing, and he is also participating in Crystal Meth Anonymous meetings. All of his drug tests in the three months since the June 24 conference have been negative. Pretrial Services therefore has no objection to moving him back to a 10:00 p.m. to 6:00 a.m. curfew at this time. The government defers to Pretrial Services.

Second, Mr. Schneider requests permission travel to the District of Massachusetts to visit his father, who will turn 90 this fall. Mr. Schneider proposes to leave on the afternoon of Monday, October 4, and to return on Saturday, October 9, 2021. He previously permitted to visit his father in May 2021. Pretrial Services takes no position on this application; the government defers to Pretrial Services.

Respectfully submitted,

/s/ Clay H. Kaminsky Clay H. Kaminsky Assistant Federal Defender (212) 417-8749 / (646) 842-2622

AUSA Ashley Nicolas cc: USPSO Jonathan Lettieri